

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-10-E**

IN RE: Duke Energy Carolinas, LLC's 2018  
Integrated Resource Plan (IRP)

)  
)  
) **REPLY TO**  
) **DUKE ENERGY CAROLINAS, LLC'S**  
) **RESPONSE TO SCSBA'S**  
) **COMMENTS**  
)

**INTRODUCTION**

The South Carolina Solar Business Alliance, Inc. ("SCSBA") received Duke Energy Carolina's ("DEC") Response on November 28, 2018. SCSBA's Reply follows.

**REPLY**

DEC's Response on page "2", contains an allegation that SCSBA filed its Petition to Intervene out of time. DEC is incorrect because this Commission's Order No. 2012-96 directs that Petitions to Intervene shall be filed within thirty days after the Company's IRP is posted on the Commission's website, not thirty days after the IRP is filed, as DEC incorrectly states in its Response. This Commission's document is attached hereto as Exhibit "A", and it shows that the Company's IRP was posted on **September 4, 2018**, so therefore SCSBA's Petition to Intervene which was filed on **October 3, 2018**, was timely.

In its Response to the SCSBA, DEC argues that the only issue properly before the Commission in this proceeding is whether the Company's IRP complies with the requirements set forth in Commission Order No. 1998-502. The SCSBA agrees with DEC that Order No. 1998-502 sets forth the minimum requirements necessary for an IRP to be approved by this Commission, but the SCSBA also recognizes the Commission's discretion to require additional analysis from a utility in an IRP proceeding.

As noted by DEC in its Response to SCSBA, Commission Order No. 2012-96 emphasizes the Commission's discretion to determine whether additional filings will be required of a utility or an intervenor in an IRP proceeding. In this Order, this Commission also explicitly found that it may determine, at its discretion, whether further proceedings are appropriate.

Commission Order 2012-96 also reads, “The IRP process is initiated by the annual filing of each electric utility’s integrated resource plan, which must conform to the requirements set forth by this Commission in Order No. 1998-502. The process of determining whether the IRP meets these requirements constitutes a proceeding. Going forward, the Commission will explicitly make such a determination.” SCSBA’s proposal will aid this Commission in making its determination.

DEC’s preference for maintaining the status quo in IRP proceedings in this State is duly noted. However, the SCSBA doesn’t recognize the status quo to be a limitation on the Commission’s authority to hold South Carolina utilities to a higher standard in IRP proceedings. DEC’s argument that proceedings other than the IRP represent the proper forum for consideration of any SCSBA analysis of DEC’s IRP is shortsighted. To the extent that IRP related issues are resolved by this Commission in IRP proceedings, then those same issues need not be revisited in every Docket that relies on the IRP as an essential reference document.

At this time, the SCSBA is not requesting that this Commission emulate the North Carolina IRP proceedings as outlined in DEC’s Response. When deciding whether additional time should be granted to the SCSBA for submission of an independent analysis of DEC’s IRP, however, the SCSBA does encourage this Commission to consider the regulatory rigor applied to utility IRPs in neighboring states like North Carolina and Georgia. The lengthy IRP proceedings now underway in North Carolina and soon to be underway in Georgia underscore the importance of IRPs in the multitude of utility proceedings that flow from these utility resource plans. Given the significance of DEC’s IRP, the SCSBA believes the granting of additional time from this Commission represents a reasonable request.

Respectfully Submitted,  
/s/Richard L. Whitt  
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December 3, 2018  
Columbia, South Carolina

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**Dockets** 2018-10-E (/Web/Dockets/Detail/116480)

**Date Filed** 8/31/2018

**On Behalf Of** Duke Energy Carolinas, LLC

**Summary** Duke Energy Carolinas, LLC's 2018 Integrated Resource Plan (IRP)

**Attachments**

Size	Title	Inserted On
	Transmittal letter (/Attachments/Matter/5248e2c4-26d2-44b2-9108-b10e91d3612d)	9/4/2018 @ 7:25 AM
	2018 IRP (/Attachments/Matter/0cf6f148-eb5e-45bd-a401-14aee8a148f8)	9/4/2018 @ 7:25 AM
	Cover Sheet (/Attachments/Matter/a9c63783-39ff-4a6e-90d3-12e00e20385d)	9/4/2018 @ 7:25 AM

**eService** No notifications.

**Notifications**

